

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Pilsen Soil Operable Unit 2 Residential - Removal Polrep



952338

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #20
Cleanup in the Field Completed
Pilsen Soil Operable Unit 2 Residential
C5N8RV02
Chicago, IL

To: Bruce Everetts, Illinois EPA
Mark Johnson, ATSDR
Vicente Sanchez, Alderman Solis (Chief of Staff)
Dave Graham, Chicago Dept. of Health
Terry Sheahan, Chicago Dept. of Health
Doug Ballotti, USEPA
Samuel Borries, EPA Region 5
Blaine Kinsley, IL EPA
Peachey Robert, EPA Region 5
EOC HQ, EPA HQ
Records Center, USEPA

From: Ramon Mendoza, On-Scene Coordinator

Date: 7/30/2018

Reporting Period: 7/5/2018 to 7/26/2018

1. Introduction

1.1 Background

Site Number:	C5N8RV02	Contract Number:	
D.O. Number:		Action Memo Date:	8/3/2015
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	2
Mobilization Date:	12/19/2016	Start Date:	12/20/2016
Demob Date:	7/13/2018	Completion Date:	
CERCLIS ID:	ILN000504472	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

This time critical removal action is a PRP lead under an EPA Unilateral Administrative Order.

1.1.2 Site Description

Pilsen Soil Operable Unit 2 (OU2) Residential Site : Operable Unit (OU) 2 is a residential area bounded by West 18th Place to the north, a north-south alley between South Allport Street and South Racine Avenue to the east, West 21st Street to the south, and South Loomis Street to the west. There are about 178 residential properties in this 25-acre OU2 site. About 116 of the properties have non-permanent covers in their yards such as bare soil, grass or gravel and are the focus of EPA actions. In 2010, approximately 1,563 people lived within the boundaries of the Site, and the residential yards have high accessibility to sensitive populations including young children and pregnant women.

1.1.2.1 Location Chicago, Illinois 60608

See Site Description

1.1.2.2 Description of Threat

The lead concentration in surface soils are above the EPA screening level of 400 mg/kg lead in residential yards and gardens. Residents living in these homes may be exposed to the lead in these surface soils.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA conducted Site Assessment activities in 2013 to 2015 with additional residential parcels sampled in 2016. Additional residential parcels have also been sampled in 2017 to 2018. Lead was found in surface soils in the residential yards and gardens above the EPA removal management level of 400 parts per million. The average Site surface soil lead concentrations were 1,412 mg/kg. There is an estimated population of around 1,563 people including children living, walking, working, and playing on the contaminated surface soils in the Site. These people have a high accessibility to residential yards including sensitive populations such as young children and pregnant women. EPA's risk assessment concluded that the soil concentrations of lead at the Site are at an unacceptable risk level to the residents accessing the Site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Initial residential soil cleanup work was conducted from, Dec. 20 - 23, 2016. After taking a break during the winter season, residential yard cleanup was restarted on April 24, 2017 and continued through December 22, 2017. After another break during the winter season, residential yard cleanup was restarted again this year on April 17, 2018. EPA OSC and START provided part time oversight of removal activities on site, collected soil samples as needed, and conducted XRF analysis as needed. GHD (H.Kramer's contractor) had representatives on-site to oversee the removal work. Removal work was also conducted by GHD's contractor RW Collins. START or EPA OSC documented property specific removal activities by recording field notes and by taking photographs. Air monitoring as required by OSHA was conducted by GHD.

2.1.2 Response Actions to Date:

H. Kramer contractors conducted response actions on Dec. 2016 and April - Dec. 2017. During this period H. Kramer conducted response actions in 54 residences. During this period, several owners provided consent for access for sampling and cleanup of their homes. Response actions for the aforementioned 54 homes are documented in previous pollution reports: POLREPs 1 to 15.

Work was conducted after H. Kramer's contractor (GHD) contacted the owners and agreed on a scope of work in writing. Below is a removal status summary of each of the properties. All properties were 3-4 ft. below the street level with limited access, which made excavation work more difficult and time consuming. GHD conducted project management, particulate air monitoring during excavation and backfill activities at the residential and soil staging areas. RW Collins contractor/laborers conducted the physical work of excavation and backfilling of soil and also managed the soil at the H. Kramer property staging area.

In general, unless noted for each home, lead contaminated soil was excavated by hand with shovels and fed into a vacuum hose to the vacuum truck. Yards were excavated down to 1 ft and gardens down to 2 ft below the surface. After it was filled the truck was driven to the soil staging area at H. Kramer's truck yard and the soil was transferred to steel containers, which are then transported for disposal to a solid waste landfill (Waste Management, Laraway) in Joliet IL. For backfilling, clean soil was transferred from the flatbed truck to the yard by conveyor belts, shovels and wheelbarrows to backfill. An orange fence marker was placed at the bottom of the excavation before backfilling. Final surface cover could be gravel, soil, or sod (new grass), depending on the owner preference.

Air monitoring at the homes and staging area did not show violations of the OSHA PEL criteria during this reporting period. Workers wore level D with rubber booties and gloves during excavation of lead contaminated. GHD provided a boot wash to protect workers and minimize soil migration outside of the work area.

EPA OSC met (4/12/2018) with the Chief of Staff for Alderman Solis to let them know cleanup was restarting again at the Site. EPA was briefed on most recent gang activity for the purpose of keeping cleanup crews safe. Information was passed on to H. Kramer's contractors (GHD and RW Collins).

Response actions were conducted by H. Kramer contractors from 4/16/18 to 7/05/2018. During this period, response actions were completed at eleven homes (plus two homes had additional work and completed from 2017 at request of owners). Sampling was conducted at two homes and XRF screening was conducted at two homes during this period. These activities are documented in POLREP 16 to 19.

Non-Responsive

During this reporting period, sampling was conducted at the property located at [redacted] on 7/17/18. Samples were collected from the backyard garden area as well as a soil strip within the driveway area in the backyard of the property. XRF screening indicated that the soil in the backyard garden and in the backyard driveway strip contained lead in concentrations below removal goals. GHD's lab analyzed the soil samples and preliminary results indicated soil in the backyard garden and in the backyard driveway strip contained lead in concentrations below removal goals. EPA's lab also analyzed the split soil samples and preliminary results did not correlate with the XRF screening results or GHD's preliminary results. EPA's preliminary results indicated lead in concentrations above removal goals. Following review of these results, it was determined that GHD's lab digested and analyzed 1 gram aliquots of the soil samples while EPA's lab digested and analyzed 2 gram aliquots of the soil samples. EPA had the lab reanalyze a new aliquot of the soil samples matching the 1 gram digestion of GHD's lab. On July 26, preliminary results of the reanalysis by EPA's lab indicated soil in the backyard garden and in the backyard driveway strip contained lead in concentrations below removal goals. GHD and EPA's Labs followed the EPA Method in all analyses. As a result, no removal action is planned at this property. A technical memo summarizing the soil sample results and analysis will be produced for this property.

Response Actions taken from taken at the the following homes from 7/5/2018 to 7/20/2018. All work was conducted with approval from the owners. Response actions were completed at three homes during this period:

Non-Responsive

Home at [redacted] 06/29 - 07/09/18 - Complete - Previous XRF screening conducted on 5/25/2018 indicated soil in the backyard area contained lead in concentrations above the EPA residential lead action level of 400 mg/kg and therefore required removal. The XRF data confirm EPA lab results from 2013. The crew began excavation in the backyard of the property on 6/29/2018. The backyard was excavated to a depth of 1 foot bgs. Excavation and backfill work in the backyard was completed on 7/02/2018. At the owner's request and approval, sodding and restoration of this property was started and completed on 7/09/18.

Non-Responsive

Home at [redacted] 07/03 - 07/06/18 - Complete - Sampling conducted on 4/24/2018 indicated soil in the backyard and side yard areas contained lead in concentrations above the EPA residential lead action level of 400 mg/kg and therefore required removal. Excavation began and was completed in the backyard and side yard areas on 7/03/2018. The backyard and side yard areas were excavated to a depth of 1 foot bgs. At the owner's approval, backfilling with gravel and restoration work began on 7/05/2018 and was completed on 7/06/2018.

Home at [redacted] Non-Responsive 07/06 - 07/12/18 - Complete - Sampling conducted on 7/05/2018 indicated soil in

the backyard contained lead in concentrations above the EPA residential lead action level of 400 mg/kg and therefore required removal. The crew began prepping the backyard for removal work on 7/06/18. Removal work began and was completed on 7/10/18. At the owners approval, backfilling with gravel, soil, and sod began on 7/10/18 and was completed on 7/11/18. Restoration of the backyard was completed on 7/12/18.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

During EPA's Removal Site Evaluation (2013-14), H. Kramer & Co. was identified as a significant contributor to the lead found in surface soils in the residential parcels at the Site, due to historical fugitive air emissions of dust which contained lead (slag and zinc oxide). The response work is being overseen by EPA/START contractor and is being conducted by H. Kramer's contractors under a Unilateral Administrative Order (UAO) issued by the USEPA (Sept. 2016). Previous sampling work was conducted from April to June 2016 by H. Kramer's contractors at the Site under an EPA (CERCLA Administrative Order on Consent; to determine the amount of homes above the lead screening level of 400 mg/kg which needed to be cleaned up.

2.1.4 Progress Metrics :

As of July 30, 2018, 70 residential parcels have undergone cleanup. 69 of these underwent soil removal of lead contaminated soil. One homeowner installed a concrete cover over his driveway to encapsulate the lead contaminated soil. Eight homes were not remediated because the lead in soil was below the 400 mg/kg action level (for lead). Owners of four parcels refused to grant access.

During the reporting period as of July 11, 2018, 50.74 tons of lead contaminated soil was disposed. H. Kramer's contractors have disposed of 1188.75 tons of non-hazardous lead contaminated soil to the EPA approved solid waste landfill facility in Joliet, IL (Waste Management Landfill); since excavations of parcels were initiated in Dec. 2016. A waste stream summary table is provided below and in the documents page of the Pilsen Soil OU2 Residential site.

Waste Stream	Medium	Quantity (in tons)	Manifest/Ticket#	Treatment	Ship Date	Disposal Facility
Soil		10.16	851385		12/22/2016	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.42	889972		4/26/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.98	890592		4/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.39	891212		4/28/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		7.95	894904		5/8/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.98	896484		5/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.78	898993		5/16/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.71	900453		5/18/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.89	900819		5/19/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.49	901772		5/23/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.92	902005		5/23/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.66	902633		5/24/2017	Laraway RDF, Waste Management,

						Joliet, IL.
Soil		10.65	904544		5/31/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.78	904744		5/31/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.69	915148		6/19/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.51	912918		6/20/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.71	923037		7/17/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.29	923543		7/18/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.56	925351		7/21/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.33	925625		7/24/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.62	926172		7/25/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.09	926615		7/26/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.76	927883		7/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.66	933810		8/14/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.47	935594		8/17/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.76	941816		8/29/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.33	940041		9/1/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.09	941952		9/5/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.16	945518		9/6/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.14	945956		9/12/2017	Laraway RDF, Waste Management,

						Joliet, IL.
Soil		15.12	946578		9/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.39	94880		9/18/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.12	959184		9/20/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.69	951525		9/22/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.51	953264		9/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		16.95	961224		10/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		18.71	961440		10/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		18.48	961668		10/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.39	963390		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.12	963391		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		16.15	963537		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		17.77	963538		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		19.9	963853		10/16/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.5	966082		10/19/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.19	967586		10/24/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.98	968461		10/26/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.1	969072		10/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.89	970192		10/30/2017	Laraway RDF, Waste Management,

						Joliet, IL.
Soil		13.73	970505		10/30/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.37	970785		10/31/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.82	976978		11/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.11	980304		11/16/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.19	985773		11/28/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.7	985773		11/28/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.19	985957		11/29/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.94	988543		12/4/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.23	990500		12/6/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.16	992436		12/8/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.74	996636		12/15/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.84	1032003		4/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.79	1033160		4/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.2	1034605		4/24/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.8	1035962		4/26/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.33	1037089		4/30/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.14	1042278		5/10/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.74	1042844		5/11/2018	Laraway RDF, Waste Management,

						Joliet, IL.
Soil		14.53	1046546		5/22/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.12	1046690		5/23/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.3	1048833		5/30/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		16.24	1049275		5/31/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.74	1054620		6/12/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.79	1056793		6/15/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.31	1057862		6/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.92	1057974		6/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		8.03	1057990		6/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.9	1058124		6/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.07	1058426		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.74	1058479		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.52	1058490		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.33	1058496		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.76	1058768		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.46	1058801		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.95	1058813		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		7.77	1058837		6/19/2018	Laraway RDF, Waste Management,

						Joliet, IL.
Soil		8.68	1059174		6/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.03	1059180		6/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.81	1059204		6/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		8.09	1059218		6/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		2.01	1059491		6/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.76	1064315		7/3/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.91	1064656		7/3/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.93	1067061		7/10/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.14	1067615		7/11/2018	Laraway RDF, Waste Management, Joliet, IL.
Total		1188.75 tons				

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

As of 7/12/2018, the total number of parcels remediated by H. Kramer stands at 69. H. Kramer contractors (GHD and RW Collins have demobilized from the Site. No additional consents for access have been received from the community. All homes identified by EPA for cleanup have been addressed by H. Kramer contractors at this time.

2.2.1.2 Next Steps:

H. Kramer contractor's GHD and RW Collins have completed remediation of all homes identified on their list. At this time no additional removal work is anticipated at the Site. H. Kramer contractor GHD plans to meet with EPA and START contractor to discuss the next step, which is for GHD to prepare the Final Report documenting all the work conducted to comply with the EPA Order.

2.2.2 Issues :

An EPA technical memo summarizing the soil sample results and analysis will be produced to document the sampling and analysis issues addressed at the last home (see operations section).

OSC worked with the alderman's office to ensure crews are not ticketed (Parking violations) when working to cleanup the homes in the neighborhood.

2.3 Logistics Section

Work this period was supported by 4 laborers (includes one operator), an additional 2 operators, a foreman, technical engineer, EPA START contractor, and EPA OSC.

Equipment includes one pickup truck, one dump truck, one skid steer, two 20 yard containers, one soil vac truck, three 10 foot conveyor belts, and hand dig tools. Equipment utilized during this reporting period also included a walk behind mini skid steer or "dingo" to assist in excavation of soil.

At this time all personnel have demobilized from the Site.

2.4 Finance Section

2.4.1 Narrative

The START total budget ceiling is currently \$120,000. Of this amount a total of \$104,477.76 (as of July 20, 2018) has been spent overseeing the responsible party contractor removal activities, overseeing responsible party contractor sampling activities, and collecting/analyzing soil samples under the EPA Administrative Order on Consent. Additional funds were utilized for technical support for the Unilateral Administrative Order for the Site. This additional budget is estimated to fund START's continued oversight work and cleanup support through August 2018.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	\$120,000.00	\$104,477.76	\$15,522.24	12.94%
Intramural Costs				
Total Site Costs	\$120,000.00	\$104,477.76	\$15,522.24	12.94%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Ramon Mendoza, EPA OSC, (with EPA START supporting);
Walt Pochron, Ivan Navarro; GHD (H. Kramer contractor)

2.5.2 Liaison Officer

EPA Community Relations: Heriberto Leon

2.5.3 Information Officer

EPA PIO: Francisco Arcaute, Rachel Bassler

3. Participating Entities

3.1 Unified Command

None

3.2 Cooperating Agencies

City of Chicago, Alderman Solis Office
City of Chicago Dept. of Public Health;
Illinois EPA
ATSDR

4. Personnel On Site

Pilsen OU2 Removal – Personnel Counts Notes: START is EPA's oversight contractor GHD and RW Collins are H. Kramer Contractors.					
Date	EPA	GHD	RW Collins	EPA/START	
7/5 to 7/13/2018	1 OSC (not onsite at all times)	1	5	1 (present onsite, supporting EPA OSC oversight)	

Note: As of 7/30/2018 All personnel have demobilized from the Site.

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

<https://www.epa.gov/il/pilsen-area-soil-site>

6.2 Reporting Schedule

A final POLREP will be issued once the Final Report from H. Kramer (GHD contractor) has been approved by EPA.

7. Situational Reference Materials

See link for the Site at: <https://www.epa.gov/il/pilsen-area-soil-site>





